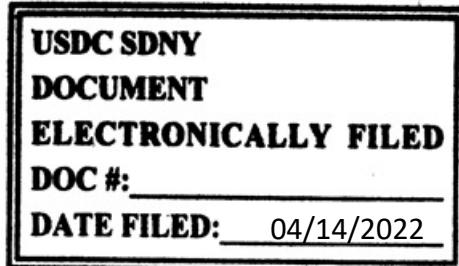


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April 11, 2022



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**VIA ECF**

The Honorable Stewart D. Aaron  
United States Magistrate Judge  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007  
United States of America

Allianz Global Investors GmbH, et al., v. Bank of America Corporation, et al., 1:18-cv-10364

Dear Judge Aaron:

Pursuant to Rules I.B.1 and I.D of Judge Schofield's Individual Rules and Procedures for Civil Cases, we respectfully seek leave to file under seal certain supporting papers and exhibits to Plaintiffs' Motion for Issuance of a Hague Convention Request for International Judicial Assistance to Take Testimony Overseas. Pursuant to Rule I.D.3, this motion and supporting papers have been publicly filed with the redactions, and unredacted versions have been electronically filed under seal and linked to this application.

This request asks the Court to seal the Third Amended Complaint (already filed under seal), documents that reference numerous chat transcripts that Defendants produced and designated as confidential, copies of the chat transcripts, and personal information about the proposed deponent. Given Defendants designated these materials as "confidential," supporting papers include documents already filed under seal, and sensitive personal information of the deponent is contained within these papers, Plaintiffs respectfully request that the Court grant Plaintiffs permission to file the requested documents in redacted form on ECF and in unredacted form under seal.

**quinn emanuel urquhart & sullivan, llp**

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Respectfully submitted,

/s/ Daniel L. Brockett

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Request GRANTED. The proposed sealing requests are narrowly tailored to prevent unauthorized dissemination of sensitive business information. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). SO ORDERED.

Dated: April 14, 2022

*Asst cl an*